

The Law Office Of
ANTHONY M. GRANDINETTE

Of Counsel:

Paul Casteleiro
New Jersey

Bryant R. Camareno
Florida

114 Old Country Rd. Suite 420 • Mineola, NY 11501

Telephone: (516)877-2889

Telecopier: (516)294-5348

Email: Grandinettelaw@gmail.com

May 24, 2013

Magistrate A. Kathleen Tomlinson
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Thomas M. Moroughan v. The County of Suffolk, et al.
Docket No.: CV-12-0512

Dear Magistrate Tomlinson:

This office is counsel to plaintiff, Thomas M. Moroughan (Moroughan) and I submit this letter to the Court on Mr. Grandinette's behalf, seeking an extension of time to file a response to Suffolk County's Motion to Quash (DE 87) beyond the three business day limit set forth in Your Honor's Individual Practice Rules.

On May 22, 2013 the County of Suffolk filed a Motion to Quash (DE 87) plaintiff's subpoena commanding the disclosure of all documents from the Suffolk County District Attorney's Office related to the arrest and criminal investigation of plaintiff. Mr. Grandinette is currently out of the country and will not return until May 31, 2013.

As Mr. Grandinette is out of the country and unable to file a response within three days, I spoke this morning to Assistant Suffolk County District Attorney Anne E. Oh, Esq. and obtained verbal consent to extend plaintiff's time to file a response to Suffolk's Motion to Quash.

I therefore respectfully submit this request for an extension of time within which to respond to Suffolk's Motion to Quash until June 5, 2013, three business days after Mr. Grandinette's return from abroad.

Respectfully submitted

Bryan A. Zuckerman, Esq.

cc: County of Suffolk Office of the County Attorney
Brian C. Mitchell, Esq.
H. Lee Dennison Building
100 Veterans Highway
P.O. Box 6100
Hauppauge, New York 11788-0099

County of Suffolk Office of District Attorney
Appeals Bureau
Anne E. Oh, Esq.
Criminal Courts Building, 200 Center Drive
Riverhead, New York 11901-3388

County of Nassau Office of the County Attorney
County Attorney Michael Ferguson, Esq.
Ralph G. Caso Executive and Legislative Building
1 West Street
Mineola, NY 11501-4820

Barket, Marion, Epstein & Kearon, LLP
Attn: Amy B. Marion, Esq.
666 Old Country Road, 7th Floor
Garden City, New York 11530